

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

FRANCO RIBEIRO and DEANNA)
RIBEIRO, as individuals and as next)
friends and biological parents of)
LUCAS RIBEIRO, an infant,)
)
Plaintiffs,)

Case No. 8:12cv204

vs.)

BABY TREND, INC.; MARK SEDLACK;)
MILLENIUM DEVELOPMENT CORP.;)
INDIANA MILLS & MANUFACTURING,)
INC.; LERADO GROUP CO., LTD.;)
LERADO GROUP (HOLDING))
COMPANY, LTD.; LERADO (ZHONG)
SHAN) INDUSTRIAL CO., LTD.;)
LERADO CHINA LIMITED; LERADO)
HK LIMITED; HOLMBERGS SAFETY)
SYSTEM HOLDING AB f/k/a)
HOLMBERGS CHILDSAFETY AB;)
HOLMBERGS CHILDSAFETY AB f/k/a)
KENDRION HOLMBERGS AB d/b/a)
HOLMBERGS; HOLMBERGS SAFETY)
SYSTEM HOLDING AB f/k/a)
HOLMBERGS CHILDSAFETY)
HOLDING AB d/b/a HOLMBERGS;)
GNOSJÖGRUPPEN AB f/k/a)
KENDRION AUTOMOTIVE METALS)
AB d/b/a HOLMBERGS; HOLMBERGS)
SAFETY SYSTEM HOLDING AB,)
GNOTEC REFTELE AB,)
MAXI MILIAAN B.V., and)
DOREL INDUSTRIES, INC.,)
)
Defendants.)

**DEFENDANTS, BABY TREND, INC.;
MARK SEDLACK; AND MILLENIUM
DEVELOPMENT CORP.'S,
MOTION TO COMPEL PLAINTIFFS'
DEPOSITIONS**

COME NOW Defendants, BABY TREND, INC.; MARK SEDLACK; and MILLENIUM DEVELOPMENT CORP., by and through their counsel of record, PATTON & RYAN, LLC, pursuant to Rules 30 and 37 of the Federal Rules of Civil Procedure, hereby file this Motion to Compel Plaintiffs' depositions (hereinafter the "Motion"). This Motion seeks to compel Plaintiffs to appear for their depositions prior to the Defendants' depositions, and subsequent to

the first inspection consisting of nondestructive testing. A brief, index of evidence, and exhibits thereto supporting this Motion will be filed contemporaneously with the Motion. The Defendants' motion to compel inspections and testing will also be filed contemporaneously with this Motion.

Pursuant to NECivR 7.1(i), the undersigned counsel states that she and Plaintiffs' counsel have had personal consultation and made sincere attempts to resolve this discovery dispute. The undersigned and Plaintiffs' counsel have discussed the issues raised in this motion via e-mail numerous times and have had telephonic conversations, including most recently on March 9, 2016. The undersigned, Plaintiffs' counsel, and counsel for Indiana Mills & Manufacturing, Inc. conferred and communicated regarding available dates for the inspection and depositions, which appear to be April 6, 22, 26, and 27; and May 24, 25, 26, 27, 30 and 31. Defendants' Counsel noticed Plaintiffs' depositions for April 22, 2016, with the inspection to take place on April 6, 2016.

Dated: March 9, 2016

Defendants, BABY TREND, INC., MARK SEDLACK,
and MILLENIUM DEVELOPMENT CORP.

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing, Defendants, Baby Trend, Inc.; Mark Sedlack; and Millenium Development Corp.'s, Motion to Compel Plaintiffs' Depositions was served on the following parties on March 9, 2016, via the Court's ECF system:

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